

10 OCT - 8 2010  
UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

HOSPITAL DAMAS, INC.

Debtor

CASE NO. 10-08844 (MCF)

CHAPTER 11

**REPLY IN OPPOSITION TO MOTION FOR AN ORDER TO SHOW  
CAUSE ON BEHALF OF JORGE GUZMAN VILLARONGA, HIS  
CONJUGAL PARTNERSHIP AND LUIS M. ORTEGA GARCIA, ESQ.**

**TO THE HONORABLE COURT:**

COME NOW, Jorge Guzman Villaronga, his conjugal partnership and Luis M. Ortega García, through their undersigned counsel and very respectfully state and pray:

1. On September 30, 2010, debtor filed a Motion for an Order to Show Cause directed to Jorge Guzman Villaronga, his conjugal partnership, Luis M. Ortega Garcia and certain other parties to show cause as to why they should not be found guilty of contempt for having violated the automatic stay provisions of 11 U.S.C. Sec. 362 (a) and sanctions and attorneys fees imposed on them.

2. With complete disregard of all the facts, debtor asserted that the appearing parties violated the automatic stay by filing a joint motion requesting an enforcement of settlement in the case of Olga Maldonado et. al. vs. Hospital Damas, case No. 09-1240 (CCC).

3. The appearing parties sustain that no violation of the automatic stay occurred as the joint motion requesting an enforcement of settlement was filed before debtor filed its voluntary petition for Chapter 11.

4. Debtor's petition was filed on September 24, 2010 at 4:26 p.m. while the above referenced joint motion was filed on September 24, 2010 at 4:17 p.m., thus no stay was violated by respondents herein.

5. Debtor should have verified the above referenced facts before filing the motion for an order to show cause, thus attorneys fees should be imposed on debtor.

WHEREFORE, respondents herein respectfully request that debtors request for order to show cause be denied and attorneys' fees should be imposed on debtor.

RESPECTFULLY SUBMITTED.

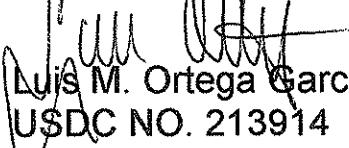
I HEREBY CERTIFY: That on this same date a copy of the foregoing document has been mailed to Charles A. Cuprill-Hernández, Esq., 356 Fortaleza Street, Second Floor, San Juan, Puerto Rico 00901; Rafael E.

García-Rodón, Esq., Banco Popular de Puerto Rico, 7<sup>th</sup> Floor, Suite 701, 206 Tetuán Street, San Juan, Puerto Rico 00901; Anselmo Irizarry-Irizarry, Esq., P.O. Box 335060, Ponce, Puerto Rico 00733-5060 and to Rafael Mayoral-Morales, Esq., P.O. Box 9022512, San Juan, Puerto Rico 00902-2512.

In San Juan, Puerto Rico, this 7<sup>th</sup>. day of October, 2010.

MIRANDA CARDENAS & CORDOVA  
P.O. Box 9023998  
San Juan, Puerto Rico 00902-3998  
Tel. (787) 721-3208  
Fax (787) 721-7875

By:

  
Luis M. Ortega García  
USDC NO. 213914  
E-Mail: [ortegalaw@microjuris.com](mailto:ortegalaw@microjuris.com)